

**Exhibit C**

Order Granting Access to 2019 Exhibits (*Porter Hayden*)

Signed: October 01, 2015

SO ORDERED



  
JAMES F. SCHNEIDER  
U. S. BANKRUPTCY JUDGE

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MARYLAND  
(BALTIMORE DIVISION)**

**In re:**

**PORTER HAYDEN COMPANY,**

**Debtor.**

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**Case No. 02-54152 JFS**

**CONSENT ORDER GRANTING MOTION OF HONEYWELL INTERNATIONAL INC.  
FOR ACCESS TO RULE 2019 EXHIBITS**

Upon the *Motion of Honeywell International Inc. for Access to Rule 2019 Exhibits*, (the “Motion”) [ECF No. 1254],<sup>1</sup> the *Joinder of Ford Motor Company* to the Motion (the “Joinder”) [ECF No. 1257], and the *Limited Objection to Motion for Access to Rule 2019 Exhibits* (the “Limited Objection”) [ECF No. 1267] filed by certain individuals represented by the Law Offices of Peter G. Angelos, P.C., Brayton Purcell, LLC and Wilentz Goldman & Spitzer, P.A.; and due and appropriate notice of the Motion and Joinder having been given; and the Court having reviewed the Limited Objection and there being no other timely objections filed to the Motion; and the Court having jurisdiction over this matter pursuant to 28 U.S.C. Sections 157

<sup>1</sup> Capitalized terms used but not defined herein have the meanings ascribed to such terms in the Motion.

and 1334; and the Court having found that the Motion is a core proceeding pursuant to 28 U.S.C. Section 157(b)(2) and that the Court may enter an order consistent with Article III of the United States Constitution; and the Court having found that venue of this proceeding and the Motion in this District is proper pursuant to 28 U.S.C. Section 1409; and after due deliberation and consideration and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Motion is granted as set forth herein. The Limited Objection is overruled and denied except as set forth herein.

2. Subject to the limitations in the following paragraphs, Honeywell International Inc. and Ford Motor Company (collectively, the “Movants”) are entitled to access, inspect, copy, and receive copies of, during the clerk’s normal business hours, any and all of the 2019 Exhibits filed with the Court in compliance with the 2019 Order or Bankruptcy Rule 2019, regardless of how the 2019 Exhibits are maintained.

3. Movants are not entitled to access, inspect, copy, or receive any forms of agreement or instruments whereby the filing law firms were empowered to act on behalf of their clients, including any exemplars thereof, that were submitted as part of the 2019 Exhibits (the “2019 Retention Agreements”); the same shall be kept off the docket, and, if any 2019 Retention Agreements are inadvertently provided to the Movants, the Movants shall not review any such 2019 Retention Agreements, shall promptly destroy any such 2019 Retention Agreements, and shall not provide any of them to any person or entity, or use any of them for any purpose whatsoever.

4. Movants are entitled to copy or receive only the last four (4) digits of any social security number contained in the 2019 Exhibits. The first five (5) digits of any social security

number contained in the 2019 Exhibits shall be redacted therefrom prior to the same being made available for inspection. To the extent that Movants receive any portion of any social security number other than the last four (4) digits, Movants shall not review such additional digits, shall promptly redact such additional digits, and shall not provide them to any person or entity or use them for any purpose whatsoever.

5. The clerk of the court and counsel to the Debtor are each authorized to make and deliver to Movants and their respective counsel copies of the 2019 Exhibits in the possession of the clerk of the court or counsel to the Debtor, respectively, excluding (i) the first five digits of social security numbers, if any, contained in such exhibits and (ii) any 2019 Retention Agreements. Movants requesting the 2019 Exhibits pursuant to this Order shall reimburse the clerk or the court or counsel to the Debtor, respectively, for all reasonable fees and expenses incurred in making and delivering such copies.

6. Notwithstanding any prior order of this Court to the contrary, Movants shall be free to use, transfer, or publish the 2019 Exhibits without restriction, provided that: (1) the redactions ordered herein have been made, and (2) that such use, transfer, or publication by Movants is otherwise in accordance with applicable law, rules and regulations.

7. This Order does not constitute a determination regarding either the relevance or admissibility of the 2019 Exhibits or the information therein in any judicial or other proceeding, or the standing of any person, including, without limitation, the Movants, the Claimants or the Debtor, to object to the use of the 2019 Exhibits on relevance or admissibility grounds in any such proceeding, and all parties' rights, claims, defenses, and arguments with respect to such issues are preserved.

8. This Order is without prejudice to Movants' right to seek further relief from this Court with respect to the 2019 Exhibits.

9. This Court shall retain jurisdiction to interpret, apply, and enforce this Order to the fullest extent permitted by law.

**REVIEWED AND CONSENTED TO:**

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| <p><u>/s/ Alan M. Grochal</u><br/> Alan M. Grochal, Bar No.: 01447<br/> Tydings &amp; Rosenberg LLP<br/> 100 East Pratt Street, 26<sup>th</sup> Floor<br/> Baltimore, MD 21202<br/> (410) 752-9715<br/> <a href="mailto:agrochal@tydingslaw.com">agrochal@tydingslaw.com</a></p> <p>AND</p> <p>MCDERMOTT WILL &amp; EMERY LLP<br/> Peter John Sacripanti (<i>pro hac vice pending</i>)<br/> John J. Calandra (<i>pro hac vice pending</i>)<br/> Darren Azman (<i>pro hac vice pending</i>)<br/> 340 Madison Avenue<br/> New York, New York 10173-1922<br/> Telephone: (212) 547-5400<br/> Facsimile: (212) 547-5444</p> <p><i>Attorneys for Honeywell International, Inc.</i></p> | <p><u>/s/ Paul M. Matheny</u><br/> Paul M. Matheny<br/> Law Office of Peter G. Angelos, P.C.<br/> 100 North Charles Street<br/> One Charles Center – 22<sup>nd</sup> Floor<br/> Baltimore, Maryland 21201<br/> 410-649-2000<br/> <a href="mailto:pmatheny@lawpga.com">pmatheny@lawpga.com</a></p> |
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**Certification Pursuant to Admin. Order 03-02, Ex. A, Sec. V.B.1**

I HEREBY CERTIFY that the terms of the copy of the foregoing consent order submitted to the Court are identical to those set forth in the original consent order; and the signatures represented by the /s/ on this copy reference the signatures of consenting parties on the original consent order.

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**END OF ORDER**